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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 CONNIE COX-CAIRNS,)	
)	Case No. 2:15-cv-01077-LDG-NJK
14 Plaintiff,)	
)	
15 v.)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME
16 CAROLYN W. COLVIN,)	(FIRST REQUEST)
Acting Commissioner of Social Security,)	
)	
17 Defendant.)	
)	
18)	

19
20 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)
21 respectfully requests that the Court extend the time for her to file her Cross-Motion To Affirm by 30
22 days, from December 14, 2015 to January 13, 2016.

23 An extension of time is needed in order to prepare Defendant’s Cross-Motion To Affirm because
24 of workload concerns, and that the case was recently reassigned to counsel. This request is made in
25 good faith with no intention to unduly delay the proceedings.
26

1 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,
2 on December 8, 2015.

3 Respectfully submitted this 9th day of December 2015.

4 DANIEL G. BOGDEN
5 United States Attorney
6 BLAINE T. WELSH
7 Chief, Civil Division

8 /s/ Richard Rodriguez
9 RICHARD RODRIGUEZ
10 Special Assistant United States Attorney

11 OF COUNSEL:

12 DEBORAH LEE STACHEL
13 Acting Regional Chief Counsel, Region IX
14 STACY WIESBROCK
15 Assistant Regional Counsel

16 IT IS SO ORDERED:

17 
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: December 9, 2015
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